

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES

Plaintiff,

v.

BERNARD KLEIN,

Defendant.

CRIMINAL NO. 20-062-WES-LDA

DEFENDANT'S CONSENT MOTION TO CONTINUE SENTENCING DATE

Defendant Bernard Klein hereby moves this Court to continue the sentencing hearing currently set for December 4, 2020, to January 4, 2021, or a date convenient to the Court during the month of January.

In support of this motion, Defendant states the following:

1. Because of a variety of scheduling difficulties, including the observance of religious holidays in September and October 2020, Defendant's interview with the United States Probation Office, District of Rhode Island, has been scheduled for October 15, 2020.
2. The first draft of the Presentencing Report is currently set to be completed by October 30, 2020.
3. In order to provide sufficient time for the Probation Officer to complete her investigation and draft a report, Defendant seeks a continuance of the sentencing hearing of approximately 30 days.

On September 21, 2020, Defendant's counsel conferred with AUSA Sandra Hebert, who represented that the government consents to the continuance as requested.

Respectfully submitted,

/s/ James M. Trusty

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Counsel for Defendant Bernard Klein

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2020, I served the foregoing by electronically using the CMF/EMF system.

Respectfully submitted,

/s/ James M. Trusty

James M. Trusty

Counsel for Defendant Bernard Klein